

March 17, 2003

Ms. Deborah Orr, SE-4J U.S. Environmental Protection Agency Region V 77 West Jackson Boulevard Chicago, Illinois 60604-3589

Dear Ms. Orr:

Re: IDEM's Brownfields Assessment Grant Application Final Proposal

Please find enclosed the Indiana Department of Environmental Management's (IDEM) final proposal/application for the EPA Brownfields Assessment Grant. IDEM is pleased with being invited to submit a final proposal and welcomes the opportunity to maximize its state brownfield resources with the newly available federal brownfields funding. IDEM's final proposal contains the funding request for three initiatives under the Brownfields Assessment Grant category:

1. Abandoned Landfill Assessment Grant

In order to assist in quantifying the impacts that abandoned landfills have on Indiana's environment and to facilitate brownfields redevelopment, IDEM requests \$150,000 in assessment grant monies to investigate conditions at abandoned landfills. Grant monies will be utilized by IDEM to perform Phase I and Phase II Environmental Site Assessments of selected abandoned landfills with the long-term goal of promoting and facilitating sustainable redevelopment.

2. Brownfields/Voluntary Remediation Program (VRP) Project Track Grant

IDEM proposes to provide eligible entities, such as local units of government, the opportunity to achieve a higher level of environmental liability protection than what is currently available through IDEM's Brownfields Program by funding program oversight and sampling costs associated with acquiring a VRP Covenant Not To Sue. The total amount requested is \$100,000.

3. Abandoned Tank Facility Identification and Assessment Grant

IDEM requests \$150,000 to identify and perform environmental assessments on abandoned petroleum tank sites in Indiana, with the ultimate goal of remediation, sustainable redevelopment, and placement back on the tax rolls.

IDEM submits this proposal to enhance Indiana's brownfield redevelopment incentives and to support and advance communities' brownfields efforts. The agency believes that small and disadvantaged communities with fewer brownfield resources and less experience will especially benefit. Based on the importance of these initiatives for Indiana and IDEM's desire to focus more resources towards disadvantaged communities, IDEM does not foresee any barriers to the implementation of these proposed projects should these funds be awarded. IDEM is committed, despite hiring limitations for state agencies, to dedicate the resources necessary to carry out the brownfields work outlined in the grant proposal.

Thank you for your consideration with this final Brownfields Assessment Grant proposal. Please contact me or the Brownfields Program section chief, Gabriele Hauer, with any questions at 317- 233-2773 or toll free at 800-451-6027.

Sincerely,

Bruce H. Palin,
Deputy Assistant Commissioner
Office of Land Quality
Indiana Department of Environmental
Management

BHP/sb

cc: Myra Blakely, EPA Headquarters

Final Proposal for U.S. EPA Brownfields Assessment Grant

Name of Applicant: Indiana Department of Environmental Management (IDEM) Brownfields

Program

Project Contact: Gabriele Hauer, Section Chief

IDEM Brownfields and Abandoned Landfills Programs

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Project Titles: Abandoned Landfill Assessment Grant (\$150,000)

Brownfields/Voluntary Remediation Program Project Track Grant

(\$50,000 Petroleum & \$50,000 Hazardous Substances)

Abandoned Tank Facility Inventory and Assessment Grant (\$150,000)

The following is a breakdown of IDEM's budget for the assessment grant. Broken into two sections for hazardous materials and petroleum contamination, the budget summarizes the project tasks for all three initiatives. See below for an explanation of the project tasks, and see *Attachment #1* for individual budgets for each initiative.

BROWNFIELDS ASSESSMENT GRANT HAZARDOUS MATERIALS BUDGET SUMMARY									
Budget	Task 1	Task 2	Task 3	Task 4	Totals				
Categories	Inventory	Community Outreach	Phase I & II	Final					
		& Education	ESAs	Assessment Activities					
Personnel	\$1,500	\$5,784	\$32,040	\$16,825	\$56,149				
Fringe Benefits	588	2,290	12,751	7,001	22,630				
Travel	100	190	178	78	546				
Supplies	100	542	584	129	1,355				
Contractual	1,037	1,538	95,711	6,517	104,803				
Other	102	148	400	349	999				
Indirect	358	1,386	7,686	4,088	13,518				
Charges									
Total	\$3,785	\$11,878	\$149,350	\$34,987	\$200,000				

BROWNFIELDS ASSESSMENT GRANT PETROLEUM BUDGET SUMMARY

Project Tasks					
Budget Categories	Task 1 Inventory	Task 2 Community	Task 3 Phase I & II	Task 4 Final	Totals
		Outreach & Education	ESAs	Assessment Activities	
Personnel	\$2,862	\$6,559	\$13,335	\$15,658	\$38,414
Fringe Benefits	1,000	2,336		6,481	14,937
Travel	65	65	247	117	494
Supplies	0	76	77	77	230
Contractual	25,000	0	105,015	5,015	135,030
Other	180	599	660	301	1,740
Indirect Charges	663	1,527	3,166	3,799	9,155
Total	\$29,770	\$11,162	\$127,620	\$31,448	\$200,000
Total for Hazard	ous Materials		\$400,000		

Note: Contractual costs under this grant will be approximately 60% of the total amount awarded. Contracts will be awarded to outside contractors based on guidelines established by the state of Indiana which are consistent with federal procurement requirements. These standards assure that the contracts will be awarded in a fair and equitable manner. The total contractual cost for the abandoned landfill initiative is \$94,770 and will be for contractual laboratory costs for soil and groundwater samples taken at chosen landfill sites. A portion of the contractual costs will be applied to the installation of groundwater monitoring wells at landfill sites with potential groundwater contamination. The total contractual cost for the brownfields/voluntary remediation project initiative is \$20,063. Contractual cost under this initiative will be used for document reviews. The documents will include Phase I Environmental Site Assessments (ESAs), Phase II ESAs and Remediation Work Plans. Contractors may also need to attend meetings with program participants. The total contractual cost for the abandoned tank initiative is \$125,000 and will be used to take an inventory of abandoned tank sites in counties chosen for location and environmental justice concerns. Contractors will research county records for ownership and tax payments for these sites and then forward all information to IDEM to determine eligibility. Contractual costs also include performing soil and groundwater assessments. A written report of all findings will be provided to IDEM and the local community.

Note: Other includes miscellaneous expenses such as gasoline for vehicles, legal advertising, mobile phones and printing.

Project Tasks

<u>Task 1: Inventory</u> Conduct an inventory of abandoned tank and abandoned landfill sites for the state. This would establish the universe of sites and help determine eligibility.

<u>Task 2: Community Outreach & Education</u> Conduct outreach to communities that would benefit from the grant-funded activities and meet the respective proposed selection criteria for

the three initiatives. Outreach activities may involve interagency resources and would be conducted on a direct community assistance basis.

<u>Task 3: Phase I & II Environmental Site Assessments</u> Conduct visual site inspections and review historic ownership and land uses of the target sites and surrounding properties. In addition, samples of soil and/or groundwater will be collected, tested and evaluated to determine the presence and degree of contamination. Technical documents will be generated.

<u>Task 4: Final Assessment Activities</u> Conduct reviews of Final Assessment Work Plans, provide oversight of field activities, and conduct confirmation sampling. Closure documents (Certificate of Completion and Covenant Not To Sue) will be provided.

A. Sustainable Reuse of Brownfields/Development Potential

1. Describe your vision for promoting sustainable reuse of brownfields and preventing the creation of future brownfields. Describe how you will implement this vision and how it will protect and restore the quality of the natural environment, improve the quality of life for the community, broaden prospects for future generations, and help reduce resource consumption.

The Indiana Department of Environmental Management (IDEM) Brownfields Program assists in the assessment, investigation, cleanup, and sustainable redevelopment of brownfields by helping communities identify and mitigate environmental barriers that impede economic growth. IDEM's vision is to assist communities in putting abandoned properties to productive use by promoting sustainable development—development that remains a part of the community, providing revenue and maintaining economic growth. To date, the Brownfields Program has helped approximately 300 communities in Indiana with brownfields redevelopment.

IDEM's Brownfields Program is part of a not-for-profit state environmental agency that works closely with two economic-focused state agencies, the Indiana Development Finance Authority (IDFA) and the Indiana Department of Commerce (IDOC), to utilize and leverage their respective expertise and resources for technical, financial, and community assistance. Education and outreach efforts promoting sustainable reuse of brownfields are conducted on a statewide basis through written outreach materials, IDEM's Web site, and community partnerships. For example, IDEM developed and coordinates an Indiana Interagency Brownfields Task Force. The Task Force is an affiliation of state and federal agencies, including the Indiana State Department of Health, the Indiana Land Resource Council, the Federal Highway Administration, and the Indiana Association of Cities and Towns (IACT), as well as IDFA and IDOC. These Task Force members are dedicated to the promotion of responsible brownfields redevelopment and are often able to significantly leverage resources. This group will be a vital part of implementing the three initiatives, including economic development plans, reduction of threats to human health and the environment, and uses of existing infrastructure. (For a listing of all Task Force members and contact information, see Attachment #2.)

A subgroup of the Task Force, called the Indiana Brownfields Advisory Team (IBAT), is available for project-specific meetings with local communities. IBAT was awarded the "2000 Local Best Practices Award" from U.S. Department of Housing and Urban Development (HUD), which illustrates the positive impact this team has had on Indiana communities (See Attachment #3).

To implement the Brownfields Program's vision for promoting sustainable development, IDEM is applying for this Brownfields Assessment Grant in order to provide services for smaller, rural, and/or disadvantaged communities that may not have the resources or awareness to take advantage of other brownfields redevelopment assistance. These grant-funded services will act as a catalyst, initiating efforts to potentially propel a project to completion, through private funding or additional public forms of assistance. IACT, an affiliation of the state's municipalities, which is the official voice of municipal government in Indiana, supports IDEM's effort to provide this assistance. (See IACT support letter in Attachment #4). The IACT foundation has developed an Environmental Circuit Rider Program to aid municipal officials with complex environmental issues, including brownfields. IACT is in a key position to help IDEM perform outreach to the communities that IACT serves.

IDEM will be submitting a final application to the U.S. EPA for federal CERCLA 128(a) grant monies to sustain its current Brownfields Program. However, in contrast to the 128(a) funds, the monies for the Brownfields Assessment Grant will be applied to three newly proposed initiatives. Since the 128(a) funds will only support IDEM's existing programs, and there is no additional funding source available, these proposed initiatives will not be possible without the assessment grant. (See Attachment #5 for a summary of the Brownfields and VRP 128(a) Scope of Work.) Focused outreach for the use of these assessment funds will be directed toward the types of sites and communities that have the most need for this type of assistance. Based on the importance of these initiatives and IDEM's desire to focus more resources toward disadvantaged communities, IDEM does not foresee any barriers to the implementation of the proposed projects once these funds have been awarded. IDEM is committed to apply the resources necessary to carry out this work.

The following is a brief description of each of the three proposed Brownfields Assessment Grant initiatives:

Abandoned Landfill Assessment Grant - In order to assist in quantifying the impacts that abandoned, unregulated landfills have on Indiana's environment and to facilitate brownfields redevelopment, IDEM requests \$150,000 in assessment grant monies to investigate conditions at these abandoned landfills. An abandoned landfill is a solid waste site, which may or may not contain hazardous waste, that is no longer being adequately maintained or monitored and where a viable responsible party cannot be identified or located. Grant monies will be utilized by IDEM to perform Phase I and Phase II Environmental Site Assessments of selected abandoned landfills, with the long-term goal of promoting and facilitating redevelopment in targeted communities. Brownfields/Voluntary Remediation Program Project Track Grant - To foster redevelopment by providing eligible entities, such as local units of government, the opportunity to achieve a higher level of liability protection than what is currently available through IDEM's Brownfields Program, IDEM requests grant monies to fund program oversight and sampling costs associated with obtaining a Voluntary Remediation Program (VRP) Covenant Not to Sue (CNS). The CNS is a state release from liability agreement, which is the highest level of liability protection available in Indiana. The governor's office signs the covenant after IDEM's commissioner issues a Certificate of Completion and it has been recorded onto the deed of the property, which indicates a successful end to the remediation project. Environmental liability protection is often necessary for brownfields redevelopment as communities begin securing bank loans and seeking outside buyers. Currently, the Brownfields Program offers free assistance to communities but does not offer a CNS. The total amounts requested are \$50,000 for hazardous substance

contamination and \$50,000 for petroleum contamination. Community projects fitting the selection criteria will be eligible for this extra liability protection.

Abandoned Tank Facility Inventory and Assessment Grant – IDEM requests \$150,000 to inventory and perform environmental assessments on abandoned petroleum tank sites in Indiana, with the ultimate goal of remediation and sustainable redevelopment. Abandoned tank sites are identified as abandoned properties with underground tanks that are not eligible for IDEM Leaking Underground Storage Tank or Excess Liability Trust Program funding, and where there is not a viable owner or responsible party to perform assessment or cleanup work on the site. This initiative will be an extension of IDEM's Underground Storage Tank (UST) Program efforts to evaluate all underground storage tank sites. IDEM will use these grant monies for those abandoned sites without a responsible party that fit the selection criteria, including being located in a rural area. (See Proposed Selection Criteria in Attachment #6.)

In accordance with IDEM's mission to protect human health and the environment, implementing the above initiatives will protect and restore quality of life on an environmental, social and economic level. Conducting environmental assessments identifies potential health risks and may result in cleaning up contaminated properties as necessary, mitigating potential health risks. Redevelopment of brownfields helps reduce development of existing greenspace, thereby preserving green areas outside cities, which then helps reduce environmental resource consumption. Also, the reuse of these abandoned sites as aesthetically pleasing greenspace may not only increase the overall quality of life, but may provide economic benefits through efficient resource use. In fact, communities may even surpass their economic development goals by considering the numerous costs and benefits that are not typically included in other decision-making processes (e.g., utilizing existing infrastructure, etc.). Such brownfields redevelopment projects can be models of sustainability. The result of implementing these initiatives leads to an overall improvement to the quality of life.

2. Describe the redevelopment plans for the sites or targeted areas, and how those plans fit into your community's master plan, economic development plan, or economic development activities.

As illustrated in the attached selection criteria, IDEM's redevelopment initiatives will target rural communities, supporting "Energize Indiana," the state's newest economic plan. (More information about Energize Indiana can be found at www.in.gov/gov/energize/.) Program participants providing the best evidence of a true need with community support have the best chance of receiving assistance. Preference will be given to abandoned landfills, Brownfields/VRP track projects, and USTs with a proposed end-use, especially if the reuse involves nonpolluting technologies and greenspace in redeveloping rural, economically disadvantaged areas. Having an end use may allow flexibility in setting cleanup objectives, thus facilitating a quicker cleanup and redevelopment process. Priority communities include those with a complete, long-term reuse plan, or a vision for such, and those with a prospective purchaser currently under consideration. For example, at least fifty percent of the abandoned tank assessment funds will be targeted for the Indiana extension corridor of Interstate 69. This extension, which encompasses a mostly rural and economically depressed area of Southwest Indiana, is part of the federal North American Free Trade Agreement (NAFTA) to provide an interstate highway from Canada to Mexico. This federal project will have significant state, national and international impact and will increase economic development along its route. Although it will be 10 years before this highway project is completed, IDEM intends to work

with the communities to begin development plans that will help them attract future businesses to their cities and towns, especially smaller, rural communities, which may be overlooked by largescale developers.

3. Describe how this project will stimulate economic development, including the creation of jobs, capital investment, and increases to the local tax base.

The projects for each of the three initiatives within this proposal will enhance overall brownfields public awareness, as well as address the economic benefits of brownfields redevelopment versus greenfields development through educational outreach to communities. IDEM will share statewide and national brownfields success stories with targeted communities to facilitate redevelopment. Each of the proposed assessment grant initiatives will be an additional opportunity for communities to start to achieve sustainable, responsible redevelopment. The results of these initiatives may also attract new business.

For example, when an abandoned landfill site is assessed, a community gains knowledge of site conditions and may then begin cleanup plans as necessary. Once the area is remediated, the land will be ready for responsible redevelopment. The initial assessment provides the means for improvement for the site as well as the neighboring community. Similarly, being able to provide brownfield sites with a Covenant Not to Sue at no cost to the community will foster redevelopment of properties that normally might be avoided due to environmental liability uncertainties. With the added liability protection and the knowledge that a site is suitable for redevelopment, the realization of this Brownfields/VRP project track initiative will encourage reuse of assessed and/or remediated properties more quickly for uses fitting a community's needs. Jobs will be created during all phases of redevelopment, including the site clean-up phase, as well as future construction and reuse of the property, if the intended reuse is not proposed to be new greenspace.

B. Reduction of Threats to Human Health and the Environment

1. Describe how the funds will be used to address/facilitate the identification and/or reduction of threats to human health and the environment within the target area (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum.

By assessing brownfields, IDEM will identify threats to human health and the environment in Indiana. After the potential threats are identified, they are more likely to be mitigated and/or prioritized by local government than if they had not been assessed. A variety of channels are available to local governmental entities through IDEM and its partners to assist in addressing threats to human health and the environment.

Grant funds will be used to conduct environmental site assessments according to ASTM and IDEM's Risk Integrated System of Closure (RISC) standards and will identify existing or remaining contamination by sampling and laboratory analysis of soil, ground water, and indoor air as necessary. If contamination is found, grant funds may also be used to perform risk assessments to identify pathways of potential exposure.

The overall goal of all three of the initiatives is to provide more opportunities for communities to take the first step in addressing their brownfield sites and ultimately, if a cleanup is needed, reducing threats to human health and the environment. To reflect this overarching

goal, IDEM's process for selecting sites to receive these grant-funded assessments will take into consideration on-site and nearby receptors to the potential threats posed by the brownfield site.

2. Describe how, by conducting the activities mentioned in B.1. above, your actions could affect the environment. If your actions could affect the environment, describe the alternatives you would use to mitigate the environmental impacts of your actions.

The environmental effects of the grant-funded assessment activities are intended to be positive. Assessments will be the first step in a process that would ultimately, if cleanup is deemed necessary, reduce or remove contamination from the environment, restoring land quality, ground water quality, and wildlife habitats. Environmental assessment activities typically are less intrusive than cleanup activities. For example, sites often pass site screening, and depending on the proposed land use, brownfields redevelopment could begin without remediation. Communities will be able to build on the information that is obtained in the assessment and clean up the sites if necessary.

IDEM currently has a Memorandum of Understanding with U.S. EPA, demonstrating EPA's concurrence of IDEM's expertise in conducting environmental work in a professional and responsible manner. In addition, IDEM is working under an U.S. EPA-approved Quality Assurance Project Plan that further ensures that the proposed grant-funded assessments will be conducted with a high quality approach. These assessments will be performed per IDEM-approved work plans, with professionally sound practices to prevent harmful impacts to human health and the environment. Professionals who perform the assessments will be compliant with OSHA Health and Safety regulations and safe working practices to reduce the potential health impacts to site workers and nearby residents. IDEM staff has had many years of experience in performing and overseeing environmental assessment and remediation activities. IDEM is better equipped to perform these environmental assessments than the smaller communities of Indiana where resources and environmental expertise are often lacking.

3. Describe sensitive populations (e.g., children, pregnant women, minority or low-income communities, etc.) in the community surrounding the target area or site(s) and how you derived this information.

Because specific sites for the initiatives have not yet been chosen, it is not possible at this time to describe in detail sensitive populations in the communities that will benefit from the grant-funded assessments. However, IDEM's selection criteria for determining which brownfield sites will receive the assessments will take into consideration nearby sensitive populations and potentially sensitive sub-populations. The development of the attached selection criteria (*Attachment # 6*) for all three of the proposed initiatives was guided by the same concepts and principles of the state's current brownfields grant and loan program.

To identify sensitive populations and monitor the health of nearby residents if necessary, IDEM will work with the Indiana State Department of Health (ISDH), which is a member of the Interagency Brownfields Task Force. ISDH has a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR), which has access to pertinent databases and toxicological information. In addition, IDEM will utilize Geographic Information Systems (GIS) and other indicator databases available to the state. IDEM has an agency Environmental Justice (EJ) program that is nationally recognized as a model of excellence. The agency's capability to

identify areas of potential EJ concern based on income and/or race will enable the Brownfields Program to better identify sensitive populations.

For the Abandoned Landfill Assessment initiative, for example, IDEM has created and maintains a database inventory of landfills that are no longer accepting waste and no longer have monitoring or reporting requirements to the agency. Site locations are entered into the database, and with the use of computer aided search capabilities, landfill locations are ranked for environmental sensitivity. Information that is included in the search criteria include distances of a landfill to the following points of concern: a) schools, b) residential water wells, c) high capacity water wells, d) residential areas, and e) streams or rivers. Information is also gathered regarding the location of a landfill with respect to the following: a) karst geology, b) environmentally impacted watershed (i.e., located within a Fish Consumption Advisory watershed), and c) floodplains. IDEM will include additional environmental search criteria as that information becomes available and the reliability of the information can be established. Based upon available information, IDEM has initially prioritized sites with respect to potential human risk. The other two proposed initiatives will use similar methods to prioritize sites.

4. Describe how the funds provided by this grant will be used to address/facilitate the identification and/or reduction of threats to the health and welfare of these sensitive populations.

Because the grant will be used for assessments, the funds provided by this grant will not directly reduce threats to the health and welfare of sensitive populations. However, they will be used to identify threats to sensitive populations and others by assessing the environmental conditions of community brownfield properties. After the results of the assessments are known, the communities will be better able to clean up (if necessary) and ultimately redevelop the sites, thus reducing the harmful environmental impacts of the brownfield properties.

If the grant-funded assessments determine that there are immediate human health risks, then IDEM has the capability to take steps to ensure that health risks are reduced. For example, the agency can utilize mechanisms and programs outside of the Brownfields Program to provide an alternative water supply when necessary or can perform an immediate removal if contaminant levels pose an immediate threat to human health or the environment.

5. Describe whether you are working with your state or tribal environmental authority and/or local public health department to ensure that public health issues are considered during the redevelopment process.

As mentioned, IDEM routinely works together with the Indiana State Department of Health (ISDH) and the various county health departments. These health professionals can potentially address clusters of diseases and provide air sampling if necessary. They often provide assistance with public relations in explaining health effects of contaminants and participate with IDEM in public availability sessions as necessary. IDEM's existing relationship with ISDH and the various county health departments will help ensure that public health issues are considered during the assessment activities and ultimately the redevelopment process.

C. Reuse of Existing Infrastructure

1. Describe whether the project will use existing infrastructure (e.g., public transportation, utilities, buildings) or require its expansion.

Because specific sites have not yet been chosen for the assessments, it is unknown whether or not the projects will utilize existing infrastructure. Generally, brownfield sites often have access to existing infrastructure. For example, former gas stations are often located on corner lots, so they have good access to existing roads and other public infrastructure that may facilitate redevelopment.

IDEM will work directly with targeted communities toward attaining sustainable redevelopment, including considering infrastructure reuse. With the resources available to IDEM through the Indiana Association of Cities and Towns and other Indiana Interagency Brownfields Task Force members, communities will have access to planning specialists knowledgeable in responsible redevelopment. Planning and public involvement ensure responsible growth and minimize the chance that projects will negatively impact infrastructure, both fiscally and environmentally. It will be the continued goal of IDEM to stress the importance of utilizing existing infrastructure. IDEM promotes a holistic approach, considering both economic and environmental issues. For instance, using existing roads, buildings, sewers, or other existing resources is more logical, efficient, and profitable than new development project approaches that use greenspaces and inadvertently promote urban sprawl.

2. Describe whether the project will encourage the development or redevelopment of properties with existing infrastructure and describe the infrastructure that may be reused.

The selection process of sites will favor projects that use existing infrastructure. Efficient use of existing resources will be promoted throughout the entire redevelopment process. IDEM currently conveys this concept through community outreach as a program practice. Special attention will be given to target communities not accustomed to brownfields development and redevelopment processes.

D. Greenspace/Open Space

1.Describe the extent to which a grant would facilitate the creation, preservation, or addition to a park, greenway, undeveloped property, recreational property, or other property used for nonprofit purposes.

Generally, most brownfields redevelopment projects have a great potential for preserving greenspace by reusing contaminated, or potentially contaminated land instead of developing previously undeveloped land. The sites that will be inventoried and assessed by this grant also have potential to be redeveloped into parks, greenways, or recreational properties. Projects will receive more points in the site selection process if the area is planned for redevelopment into a greenspace or open space. For example, greenspace is often the most suitable reuse for abandoned landfills due to the nature of the contamination and the challenges that future remediation engineering controls may entail.

2. Explain how this project integrates other efforts to improve/redevelop brownfields, including ongoing project(s) proposed under this grant.

The IDEM Brownfields Program is dedicated to promoting a brownfields project "pipeline," or a start-to-finish approach, which offers assistance for each stage of redevelopment. The agency strives to provide information, resources, and connections with partner agencies that can see a project through to a compatible reuse end. The state Brownfields Program currently

provides various forms of brownfields assistance, including state grants and loans for assessments and remediation of brownfield sites. In addition, IDEM encourages the utilization of federal brownfields funds, such as those available through the U.S. EPA. These forms of assistance currently available to communities will be significantly leveraged by the proposed assessment grant-funded assistance. One example of how the federal grant funding could integrate state efforts to facilitate brownfields redevelopment is the Indiana Department of Finance Authority's (IDFA) existing Petroleum Remediation Grant Incentive (PRGI). Project sites that would be assessed through the proposed Abandoned Tank Facility Inventory and Assessment Grant and found to have petroleum-related contamination could qualify for PRGI funding, which assists communities in cleaning up brownfield sites with known petroleum-related contamination. IDEM provides the technical assistance to IDFA for the PRGI initiative.

Other partner agencies that assist in brownfields redevelopment include (but not exclusively), the Indiana Association of Cities and Towns, Indiana Department of Natural Resources, Indiana Department of Commerce, Indiana State Department of Health, and the federal Department of Housing and Urban Development. These and other partner agencies are members of Indiana's Interagency Brownfields Task Force, which IDEM coordinates, along with the advisory team. U.S. EPA Region 5 has also recently become active in the Task Force. Other supporting resources integrating brownfields redevelopment efforts include IDEM's Brownfields Redevelopment Resource Guide and quarterly Brownfields Bulletin, both of which are available on IDEM's Brownfields Web page at: www.in.gov/idem/land/brownfields.

E. Community Involvement

1. Describe how you involved the local community in the development of this proposal. Provide a list of the community-based organizations involved and a contact person, phone number, and a brief description of the organization's activities and representation (these organizations may include, but are not limited to, local citizen groups, environmental organizations, civic organizations, local business groups and institutions, educational institutions, and local labor organizations).

To involve the community in the development of the Brownfields Assessment Grant proposal for the three initiatives, the agency solicited public input on the Internet, through the media, mass mailings, and in one-on-one availability sessions.

When first applying for the assessment grant monies, the agency posted an announcement about U.S. EPA implementing the new Brownfields law and offering the competitive grants on IDEM's Brownfields Program Web site, which contains up-to-date information and resources 24-hours a day. A complete draft of IDEM's initial proposal for the grant was also posted.

Upon receiving notification from U.S. EPA that the agency had been invited to prepare a final proposal, IDEM provided a public notice to be published in seven newspapers and issued a press release statewide. The release explained the grant rounds and invited interested parties to comment on the initiatives by either attending a public availability session in Indianapolis in the evening of March 17 or by calling in to a morning conference phone-in session. IDEM's Web site also advertised the availability sessions and announced that final comments would continue to be accepted until April 30. Mass mailings and e-mails regarding the proposal and availability sessions also were distributed to stakeholders for comments, including the Indiana and Indianapolis Chambers of Commerce, mayors, environmental consulting firms, lending institutions, and anyone receiving the quarterly Brownfields Bulletin newsletter. Any comments received after this grant proposal's due date will be addressed in the final work plan should the

funding be awarded. IDEM's public outreach and community involvement efforts thus far for this grant application are further documented in *Attachment #7*.

To maximize its outreach potential, IDEM's Brownfields Program also contacted other offices within the agency, such as the Office of Water Quality (OWQ). OWQ's Watershed Program works with watershed groups statewide and could disseminate information to participants who might be interested in all aspects of the proposal, including leachate from landfills, leaking underground storage tank removal, and Covenants Not to Sue for contaminated properties with point and nonpoint pollution sources near waters of the state or with the potential to contaminate surface or ground water.

2. Describe your efforts and/or plans to develop partnerships at the local, state, and/or tribal level with other stakeholders to ensure appropriate and sustainable cleanup and redevelopment of brownfields.

As mentioned previously, IDEM's Brownfields Program will work with the Interagency Brownfields Task Force and U.S. EPA Region 5 to develop plans to implement the proposed assessment grant's three initiatives. Implementation plans will focus on how to reach the smaller rural communities that have not participated in previous brownfields efforts and how best to initiate and implement a targeted community's project through the brownfields redevelopment project pipeline. Meetings may be held on a monthly to bi-monthly schedule to discern issues focusing on how a small community may begin remediation and redevelopment of the types of properties that could benefit from the three initiatives. For example, staff of IDEM's Underground Storage Tank Program are developing a plan where once a site is identified as a viable project, IDEM will set up meetings with the community leaders to discuss revitalizing projects and communicate additional avenues and funding for redevelopment. For smaller, rural communities, discussions may focus on addressing EJ concerns and reaching lower income families who may live near an abandoned landfill. IDEM has available staff fluent in languages in addition to English, so interpreters will be made available when needed to ensure clear paths of communication of issues and project goals.

3. Discuss your plan for involving the local community (e.g., neighborhood organizations, citizens' groups, borrowers, redevelopers, and other stakeholders) in cleanup decisions or reuse planning.

After discussions with the Indiana Interagency Task Force, a plan will be developed to decide the most effective means of outreach for sites under the three initiatives. For example, IDEM staff may partner with another Task Force member to visit local communities to help them foster communication between the state and their own local organizations. These outreach efforts may include holding public availability sessions in the local community with community members, elected officials, business owners, and lending institutions to explain the process.

As a result of these meetings, the interest or intensity of community support and involvement may become part of IDEM's criteria for selecting a community for the grant funding. IDEM will expect communities to demonstrate willingness for public involvement and responsibility to ensure successful completion of a redevelopment project from start to finish, with plans not only to begin assessments but to sustain development in an area, as well.

Additionally, IDEM's Brownfields Program may require a schedule of regular meetings and updates by the selected community, where agency staff may be an active one-on-one participant

assessing a project's progress. Through these meetings, reports could be posted on the Web site from which other communities could draw ideas and information.

4. Describe the means by which you will communicate the progress of your project to citizens, including plans for communicating in languages indigenous to the community.

As mentioned in previous community involvement criterion, IDEM's Brownfields Program will offer timely Web site updates. The agency will also develop news releases, fact sheets and brochures in both English and in alternate languages if demographic information suggests a need.

IDEM will include plans to reach individuals through more uncommon means of outreach, as well. Staff may attend statewide conferences or events such as the Black Expo and the Indiana State Fair. In short, IDEM will make every effort to communicate in a clear and concise manner so that all individuals will understand the opportunity these assessment grant initiatives would afford their community.